

STATE OF CALIFORNIA		
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COUNTY OF SAN FRANCISCO	)	SS

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Spanish into English and English into Spanish of the attached transcription excerpt CRS129-00-CLIP 02.

Brandon Carney, West Coast Regional Manager Geotext Translations, Inc.

State of California, County of San Francisco
Subscribed and sworn to (or affirmed) before me

by Brandon Carney

proved to me on the basis of satisfactory evidence

to be the person(s) who appeared before me.

Signature

MELISSA PIERONI COMM. # 1755133 NOTARY PUBLIC - CALIFORNIA SAN FRANCISCO COUNTY My Comm. Expires July 3, 2011

TITLE OF CLIP: CRS129-00-CLIP 02

UMV1 = First Unidentified Male Voice (Primera Voz Masculina No Identificada)

UMV2 = Second Unidentified Male Voice (Segunda Voz Masculina No Identificada)

SPEAKER	ORIGINAL	TRANSLATION (Spanish)	TRANSLATION (English)
STEVEN	[ininteligible] muy rápido.		[unintelligible] very fast.
DONZIGER	[ininteligible]		[unintelligible]
LEILA SALAZAR	[ininteligible]		[unintelligible]
LLIEA SALAZAN	[ [Innicengiale]		[unintenigible]
DONZIGER	Uh		Uh
SALAZAR	[ininteligible]		[unintelligible]
DONZIGER	Dos días. [ininteligible] viernes		Two days. [unintelligible] Friday
	ella queda. [voces solapadas]		she stays. [overlapped voices]
	¿Piensa piensa que vamos a		Do you think do you think we
	ganar el caso?		will win the case?
UMV1	Creo que sí.		I think so.
011111	ores que sir		T timik so.
DONZIGER	¿Crees que sí, or estás seguro?		Do you think so, or are you
			sure?
UMV1	Si yo podría [ininteligible]		If I could [unintelligible]
SALAZAR	[inintaligible]		[unintelligible]
SALAZAK	[ininteligible]		[unintenigible]
DONZIGER	Yeah, exactly.	Sí, exacto.	
UMV1	[ininteligible]de perder en la		[unintelligible]to lose in
	Corte Suprema que teníamos.		Supreme Court we used to
	Ésa es la clave.		have. That is the key.
DONZICED	V	C41 6: 14-: h 1 4-1	
DONZIGER	I'm only talking about the trial	Sólo me refiero al tribunal del	
	court.	juicio.	
UMV1	[inaudible]en Lago Agrio vamos		[inaudible] we are going to win
	a ganar.		en Lago Agrio.
-			
SALAZAR	[ininteligible]		[unintelligible]
UMV1	No va a haber ningún juez que		There won't be any judge who
	se anime a dictar sentencia en		would dare rule against
	contra de [inaudible]		[inaudible]
SALAZAD	No, jolvídense! Le matan.		No way! They'd kill him.
SALAZAR	No, joividense: Le matan.		No way: They u kill fillfi.
DONZIGER	Como los otros.		Like the others.
DONZIGER	Como los otros.	<u> </u>	Like the others.

SALAZAR	He'll be killed.	Lo matarán.	
DONZIGER	Yeah. Who will be killed?	Sí. ¿A quién matarán?	
SALAZAR	The judge.	Al juez.	
DONZIGER	If he rules against us or if he rules against Texaco?	¿Si falla en contra de nosotros o falla en contra de Texaco?	
SALAZAR	Against Texacoeh, against us.	En contra de Texaco—eh, en contra de nosotros.	
DONZIGER	He'll be killed.	Lo matarán.	
SALAZAR	Yeah, sure	Sí, claro	
DONZIGER	He might not be, but he'll think—he thinks he will be.	Quizás no, pero él cree—el cree que sí [lo matarán].	
SALAZAR	Yeah. And he—	Si. Y él	
DONZIGER	Which is just as good.	Lo cual es igual de bueno.	
SALAZAR	Nah, he won't be	Nah, no lo [matarán]	i
DONZIGER	[laughter]	[risa]	
SALAZAR	but he will not be [unintelligible]. He thinks that. Let him thinks [sic] that.	pero no va a [ser/estar] [ininteligible] Él cree eso. Qué lo piense.	,
UMV1	Yeah, I think that [unintelligible] [pause] again.	Sí, creo que [ininteligible] [pausa] otra vez.	
DONZIGER	Mm-hmm.	Mm-jmm.	
UMV2	Como antes. They better pick their expert.	Más vale que escojan su perito.	Like before.
DONZIGER	But, once we get the guests there, we'll do our work there, and they'll understand what they have to do. I think anything is solved in Ecuador through politics. You know?	Pero, una vez que recibamos a los invitados, haremos nuestro trabajo ahí, y entenderán lo que tienen que hacer. Creo que en Ecuador, todo se resuelve con la política. ¿Sabes?	
UMV1	As long as they are intelligent enough to understand the problem and the case.	Siempre y cuando tengan la suficiente inteligencia como para entender el problema y el caso.	

DONZIGER	Exactly. That is a very good point. You can solve anything with politics as long as the judges are intelligent enough to understand the politics. It can be—they don't have to be intelligent enough to understand the law, just as long as they understand the politics.	Exacto. Muy buen punto. Se puede resolver cualquier cosa siempre y cuando los jueces tengan la suficiente inteligencia como para entender la política. Puede ser—no es que tengan que tener suficiente inteligencia como para entender la ley, mientras entiendan la política.	
UMV1	Politics.	Política.	
DONZIGER	Politics, yeah.	Política, sí.	
UMV1	The politics behind thethe— the case.	La política en el fondo del—del caso.	
DONZIGER	Yeah, act—absolutely.	Sí, act—absolutamente.	
	[end of recording]	[fin de grabación]	

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County of New York	)	
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### **Certificate of Accuracy**

This is to certify that the attached transcription is, to the best of our knowledge and belief, a true, accurate and complete transcription from English into English of the audio files related to the following:

CRS133-49-CLIP 01

Dated: August 10, 2010

Project Manager, Legal Translations

Merrill Brink International

Sworn to and signed before

Me, this day of

2010

GINA ST LAURENT Lary Public. State of New York No. 01ST6146442

Qualified in New York County Commission Expires May 15, 2014

Page 2

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1
         MALE VOICE 1: What are your plans for
2
    the coming days?
3
         MR. STEVEN DONZIGER: We have a very,
4
    very big week coming up. We have to meet
5
    with--we are going to try to meet with the
6
    president, the new president of Ecuador who
7
    just got elected, the new Minister of
8
    PetroEcuador, the state oil company. We are
9
    going to try to meet with the new Minister
10
    of Energy, all the key people and explain to
11
    them the case.
12
         Raul Herrera, the lawyer from um--who
13
    is representing the government in the United
14
    States from the DC law firm is coming down
15
    and we set up a bunch of meetings.
16
         In addition, we have to figure out the
17
    details of the final cost estimate plan,
    which is the third and final phase of the
18
19
    evidentiary phase of the case. And all that
20
    has to happen this week. It's a lot. And I
21
    need to be in good shape to accomplish it
22
    all because I am going home next Saturday no
23
    matter what and I want it to get done. I am
24
    going home for the holidays. I'm gonna relax.
25
         [end of recording]
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STATE OF CALIFORNIA		
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COUNTY OF SAN FRANCISCO	)	SS

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from English into Spanish of the attached transcription excerpt CRS-169-05-CLIP-09.

Nicholas Bocek, Managing Editor Geotext Translations, Inc.

State of California, County of San Francisco
Subscribed and sworn to (or affirmed) before me
on this shaday of satisfactory evidence
to be the person(s) who appeared before me.
Signature:



### Title of Clip: CRS-169-05-CLIP-09

SPEAKER	ORIGINAL	TRANSLATION (Spanish)
STEVEN DONZIGER	I don't know if you read their papers, but they	No sé si has leído sus periódicos, pero
	accused the conspiracy between the Lago	denuncian la conspiración entre los
	plaintiffs and the government of trying to	demandantes de Lago y el gobierno, de tratar
	intimidate their employees	de intimidar a sus empleados
JOSEPH KOHN	Ok	Sí
DONZIGER	uhm bully the company, woo dissident shareholders like they used all this kooky language and they, uhm [chuckles]	eh amedrentar a la compañía, cautivar a los accionistas disidentesy utilizan todo este lenguaje extraño y ellos, ah [risa entre los dientes]
KOHN	[chuckles]	[risa entre los dientes]
DONZIGER	so so they—they threw back this letter that—	así así que ellos—ellos respondieron con esta carta que—
KOHN	If only they knew.	Si tan sólo supieran.
DONZIGER	Yeah, exactly. We would never do something like that	Sí, exactamente. Nosotros nunca haríamos algo así
KOHN	Yeah [chuckles]	Sí [risa entre los dientes]
	[end of recording]	[fin de grabación]



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This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from English into Spanish of the attached transcription excerpt CRS-169-05-CLIP-10.

Nicholas Bocek, Managing Éditor Geotext Translations, Inc.

State of California, County of San Francisco Subscribed and sworn to (or affirmed) before me

on this Othday of August

by Wicholes Society

proved to me on the basis of satisfactory evidence

to be the person(s) who appeared before me.

Signature:



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### Title of Clip: CRS-169-05-CLIP-10

SPEAKER	ORIGINAL	TRANSLATION (Spanish)
JOSEPH KOHN	I also saw a thing what was that thing from Winston yesterday? That excerpt that quote	También vi algo ¿qué era eso de Winston ayer? ¿Ese extracto esa cita
STEVEN DONZIGER	Yeah, I had to— [overlapped voices]	Sí, tuve que— [voces solapadas]
KOHN	from the former ambassador ?	del ex embajador?
DONZIGER	Yeah can you believe that?	Sí ¿puedes creerlo?
KOHN	So that was something they found in the discovery?	Así que ¿eso es algo que encontraron entre las pruebas intercambiadas?
DONZIGER	Yeah. There's so much in the discovery	Sí. Hay tantas cosas entre las pruebas intercambiadas
KOHN	I mean, all that stuff we'd assume they would just [unintelligible]	Es decir, todas esas cosas supondríamos que ellos sólo [ininteligible]
DONZIGER	Yeah—	Sí—
KOHN	but that's got to help, I mean, in terms of	pero eso tiene que ayudar, es decir, en términos de
DONZIGER	Yeah	Sí
KOHN	the whole	todo eso de
DONZIGER	Yeah, it's all help	Sí, sí. Todo ayuda
KOHN	duplicity if they wanted to be in Ecuador	la duplicidad si ellos querían estar en Ecuador
DONZIGER	Th— they did a, uh— they did a response to Chevron's statement of undisputed facts	Pre— prepararon una, eh— una respuesta a la declaración de hechos incuestionados de Chevron
KOHN	Okay.	Bien.
DONZIGER	and I— I'll send it to you, I mean I don't have the final	y yo— yo te lo enviaré, digo, no tengo el final
KOHN	Mm-hmm.	Mm-hmm.
DONZIGER	I was helping them with it last night but it was, uhm	yo les ayudaba con ello anoche pero era, eh
KOHN	Mm-hmm.	Mm-hmm.

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DONZIGER	there's so much in there that exposes them	hay tanto allí que los deja expuestos
	[end of recording]	[fin de la grabación]



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COUNTY OF SAN FRANCISCO	)	SS

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from English into Spanish of the attached transcription excerpt CRS-170-00-CLIP-00.

Nicholas Bocek, Managing Editor Geotext Translations, Inc.

State of California, County of San Francisco
Subscribed and sworn to (or affirmed) before me
on this May of August , 20 10,
by proved to me on the basis of satisfactory evidence
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Signature:



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### TITLE OF CLIP: CRS-170-00-CLIP-00

SPEAKER	ORIGINAL	TRANSLATION (Spanish)
STEVEN DONZIGER	Y you know, th th this is a this is a document that we prepared for the <i>Vanity</i>	Sab sabes, es es este es un este es un documento que preparamos para el reportero
	Fair reporter and it has this whole, you know	de Vanity Fair, y tiene todo esto de, sabes
	this this is what the gov uh, the Attorney	esto esto es lo que el gob eh, el Procurador
	General of Ecuador gave to the U.S.	General de Ecuador le dio al Departamento de
	Department of Justice, which is about	Justicia de Estados Unidos, que es sobre
JOSEPH KOHN	Okay.	Bien.
DONZIGER	the fraud. You know, and it's a really solid	el fraude. Ya sabes, y es una
KOHN	Okay.	Bien.
DONZIGER	capitulation	capitulación muy sólida
KOHN	But, why does it say, like, Amazon Defense on	Pero, ¿por qué dice esto de Frente de Defensa
	the front? Why doesn't it say Attorney	de la Amazonía en la portada? ¿Por qué no
	General's? You know	dice Procuraduría General? Sabes
DONZIGER	Oh	¡Ah!
KOHN	this is our summon, of what he did?	instance processes recumented to gue 41 biza?
KOHN	this is our summary of what he did?	¿esto es nuestro resumen de lo que él hizo?
DONZIGER	Yeah. You	Sí. Tú
KOHN	That's really what it says.	En realidad, eso es lo que dice.
DONZIGER	y y you know, look. For for	t t tú sabes, mira. Por por
	for for a couple of years we've been trying	por por un par de años hemos estado
	to get the Attorney General	tratando de conseguir que el Procurador General
KOLIN	Vesh	Sí.
KOHN	Yeah.	SI.
DONZIGER	to do something about this.	haga algo al respecto.
KOHN	Right.	Correcto.
DONZIGER	Well, its clear th that they don't even know	Pues, está claro qu que ellos ni siquiera
	how to put out a press release, much less	saben publicar un boletín de prensa, mucho
	write a report.	menos redactar un informe.
KOHN	Right.	Correcto.
DONZIGER	You know? So, we did the work for him.	Tú sabes. Así que, hicimos el trabajo por él.
KOHN	Okay.	Bien.

DONZIGER	Gave it to him. And of course, he's not gonna put his name on it. So, what he did is he took this and he said, 'I've been given this report,	Se lo dimos. Y, claro está, él no va a poner su nombre ahí. Así que lo que hizo fue tomar esto y decir, "Se me ha dado este informe"
KOHN	Oh, okay.	¡Ah!, bien.
DONZIGER	I've read it, and it has some very disturbing information	ya lo leí, y tiene información bastante inquietante
KOHN	'Let me know.'	'Déjame saber.'
DONZIGER	Please investigate.'	Por favor, investiguen.'
KOHN	Okay.	Bien.
DONZIGER	Okay.	Bien.
KOHN	Got you.	Ya te entendí.
DONZIGER	So	Así que
KOHN	So, he does, sort of, a covering letter	Así que él hace una especie de una carta de introducción
DONZIGER	Exactly.	Exacto.
KOHN	Alright.	Bien.
DONZIGER	He does a covering letter. You know.	Hace una carta de introducción, ya sabes.
KOHN	Alright.	Bien.
DONZIGER	And then	Y luego
KOHN	So, again, that may be something that we could facilitate going away at the right time	Así que, otra vez, eso podría ser algo que podremos agilizar para que desaparezca en el momento oportuno
DONZIGER	Exactly.	Exacto.
KOHN	if they wanted it to go away.	si quisieran que desapareciera.
DONZIGER	Precisely.	Precisamente.
KOHN	Yeah.	Sí.
DONZIGER	And then, [overlapped voices]	Y luego, [varias voces a la vez]
DONZIGER	Not that not sure our great Attorney General's office is doing anything	No es que no estoy seguro que nuestra gran Procuraduría General esté haciendo algo, sin

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	[unintelligible]	embargo [ininteligible]
DONZIGER	Yeah. Exactly, and then this is [cut-off]	Sí. Exacto, y luego esto es [se corta]
	[end of recording]	[fin de grabación]



STATE OF CALIFORNIA		
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This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from English into Spanish of the attached transcription excerpt CRS-170-00-CLIP-01.

Nicholas Bocek, Managing Editor Geotext Translations, Inc.

State of California, County of San Francisco
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Signature:



### TITLE OF CLIP: CRS-170-00-CLIP-01

SPEAKER	ORIGINAL	TRANSLATION (Spanish)
	[telephone ringing]	[suena un teléfono]
STEVEN DONZIGER	and they also have this this issue with, uh,	y también tienen este este asunto con, eh,
	the gulf witness who they denied ever	el testigo del golfo, con el que niegan haberse
	contacting.	contactado.
JOSEPH KOHN	Oh, yeah, yeah.	Ah, sí, sí, sí.
DONZIGER	They lied about that.	Mintieron sobre eso.
KOHN	How did that same Did that same out?	:Cómo llogó oso :Eso so supo?
KOHN	How did that come Did that come out?	¿Cómo llegó eso ¿Eso se supo?
DONZIGER	Well, this is the thing.	Pues, la cosa es así.
DONZIGEN	well, this is the timig.	1 403, 14 6034 63 431.
KOHN	Not really. They're too nice [unintelligible]	En realidad, no. Son demasiado amables
		[ininteligible]
DONZIGER	Raul told me that in confidence, 'cause he's	Raúl me dijo eso en secreto, porque él
KOHN	Okay	Bien
DONZIGER	discussed it with	lo ha hablado con
KOLINI	wash wash wash	
KOHN	yeah, yeah, yeah.	sí, sí, sí.
DONZIGER	the partners. So, I haven't been able to talk	los socios. Así que no he podido hablar con
DONZIGEN	to him about it	él sobre eso
KOHN	Right.	Correcto.
DONZIGER	and Raul is, like, the the least experienced	y Raúl es, digamos, el el que tiene menos
	litigator	experiencia como abogado litigante
KOHN	Yeah.	Sí.
DONZICED	in the group	on all grupo
DONZIGER	in the group.	en el grupo.
KOHN	Yeah.	Sí.
KOTIIV	Tean.	31.
DONZIGER	He's not really a litigator. So I'm, like, what's	En realidad, no es abogado litigante. Así que
	up with that piece of information? I said,	me pregunto qué pasa con ese dato. Le dije,
	'Don't you want to tell Sand that before the	"No se lo quieres decir a Sand antes del fallo
	summary judgment motions are decided?' I	sobre las peticiones para juicio sumario?" Le
	said,	dije,
KOHN	Yeah.	Sí.
DONZIGER	'How you gonna feel if they decide against	"¿Cómo te vas a sentir si deciden en tu

## Case 1:10-mc-00001-LAK Document 22-3 Filed 08/12/10 Page 19 of 29

	you and you never told him that?	contra, y tú nunca le dijiste eso a él?"
KOHN	Right.	Correcto.
DONZIGER	You know what I mean?	¿Entiendes lo que digo?
KOHN	Uh-huh.	Ajá.
DONZIGER	So, I think they ought to you know, Raul's like, 'Oh, it's a bar violation.' I said, 'Forget the bar.' I said, 'Just tell Sand they lied to you as part	Así que, creo que deberían sabes, dice Raúl, "Ah, sólo va en contra de las reglas del colegio [de abogados].' Yo le dije, "Olvídate del colegio". Dije, "Sólo dile a Sand que te mintieron como parte"
KOHN	Mm-hmm.	Hmm.
DONZIGER	of this proceeding.'	de este proceso.'
KOHN	Right.	Correcto.
DONZIGER	You know? I mean, that that fact alone will equalize all their other bullshit. Neutralize it, I mean	¿Sabes? Es decir, ese ese dato en sí equilibrará toda la otra mierda de ellos. La neutralizará, digo
KOHN	Right.	Correcto.
DONZIGER	you know?	¿sabes?
KOHN	Are you [cut-off]	Estás
	[end of recording]	[fin de grabación]



STATE OF CALIFORNIA		
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This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Spanish into English and English into Spanish of the attached transcription excerpt CRS-189-01-CLIP-01.

Nicholas Bocek, Managing Editor Geotext Translations, Inc.

State of California, County of San Francisco
Subscribed and sworn to (or affirmed) before me
on this the day of August, 20 [0]

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature:

BRANDON CARNEY
COMM. # 1755114
NOTARY PUBLIC - CALIFORNIA
SAN FRANCISCO COUNTY
My Comm. Expires July 3, 2011

TITLE OF CLIP: CRS-189-01-CLIP-01

UMV = Unidentified Male Voice (Voz Masculina No Identificada)

SPEAKER	ORIGINAL	TRANSLATION (Spanish)	TRANSLATION (English)
PABLO FAJARDO	Está el pozo Charapa-1.		Charapa-1 well is there.
UMV	Ah, Charapa-1—es—es [voces solapadas]		Oh, Charapa-1—that's—that's [overlapped voices]
FAJARDO	y está—que fue perforado por Texaco en el año '69.		and it's—it was drilled by Texaco in '69.
STEVEN DONZIGER	¿En serio?		Really?
FAJARDO	Sí.		Yes.
UMV	Sí. Ahí [ininteligible]		Yes. There [unintelligible]
FAJARDO	Ahí tienen—ahí hay tres piscinas, sin remediar.		There they have—there are three unremediated pits there.
UMV	Sí.		Yes.
FAJARDO	¿Sí? Igual en Berbejo [sic], también. Campo Bermejo también.		Right? Same in Berbejo [sic], too. Bermejo Camp as well.
DONZIGER	Pero, Charapa-1 nunca fue produc—produciendo.		But, Charapa-1 was never produc—producing.
FAJARDO	Sí, sí produjo.		Yes, it was in production.
UMV	Sí, produjo el Charapa-1.		Yes, Charapa-1 was in production.
FAJARDO	Sí, produjo.		Yes, it was in production.
DONZIGER	¿Por cuántos años?		For how many years?
FAJARDO	No me recuerdo, pero		I don't recall, but
UMV	Tres, cuatro años, no más. No mucho.		Three, four years, that's all. Not long.
DONZIGER	Eso es una [sic] buen pedazo de prueba.		That is a good piece of evidence.
UMV	Uh-huh.		Uh-huh.

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FAJARDO	Claro.		Certainly.
DONZIGER	Hecho por Texaco, dejado por cuarenta años. [voces indistintas] ¿Hay—hay—hay caminos, carreteras hasta esa [voces solapadas]		Built by Texaco, left for forty years. [indistinct voices]. Are there—are there roads, highways going to that [overlapped voices]
UMV	todo, todo, todo [voces solapadas]		everything, everything, everything [overlapped voices]
LUIS YANZA	por ahí se [ininteligible] los amigos del otro lado [voces solapadas]		friends from the other side [unintelligible] through there [overlapped voices]
UMV	Aquí están los del otro, ¿no es cierto?		Here are the ones from the other side, right?
YANZA	Era una zona de conflicto.		It was a conflict zone.
UMV	Eso era la zona de conflicto [voces solapadas]		That was a conflict zone [overlapped voices]
DONZIGER	Mm-jmm.		Mm-hmm.
YANZA	No, en serio.		No, really.
DONZIGER	¿En serio?		Really?
ANN MAEST	Oh oh	Ah ah	
DONZIGER	[unintelligible] amigos from the other side.	[ininteligible] amigos del otro lado.	[unintelligible] friends from the other side.
UMV	Bermejo—Bermejo es hac— hac—hacia—hacia—hacia		Bermejo—Bermejo is tow tow—toward—toward— toward
MAEST	I see.	ya veo.	
DONZIGER	The FARC.	El FARC.	
MAEST	Oh, the FARC	Ah, el FARC	
	[voces solapadas]		[overlapped voices]
CHARLES CHAMP	That's where we were driving through. That's where we drove through.	Atravesábamos por ahí. Por ahí atravesamos manejando.	
UMV	el oeste. Ahí está una—		the west. There is a—a—a

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una—una empresa privada y—y ha taponado la mayoría [se corta]	private company and—and it has plugged most [cut-off]
[fin de grabación]	[end of recording]

# MERRILL BRINK INTERNATIONAL



Merrill Brink International Corporation

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State of New York	)	
	)	SS
County of New York	)	

### Certificate of Accuracy

This is to certify that the attached translation is, to the best of our knowledge and belief, a true, accurate and complete translation from Spanish into English of the attached transcription excerpt CRS-198-00-CLIP-04

Dated: August 4, 2010

Maya Sidhu

Project Manager, Legal Translations

Merrill Brink International

Sworn to and signed before

Me, this

444 day of 2010

Notary Public

GINA ST LAURENT
Notary Public, State of New York
No. 01ST6146442
Qualified in New York County
Commission Expires May 15, 2014

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TITLE OF CLIP: CRS-198-00-CLIP-04

UI = Unintelligible

SPEAKER	ORIGINAL	TRANSLATION (English)	TRANSLATION (Spanish)
STEVEN DONZIGER	más cantidad de plata. No estoy tan seguro que quiero hacer, que quiero que hagamos la cantidad de plata. Pero es una posibilidad que discutir. ¿Okay? Materiales, okay, número uno es boletín.	a larger amount of money. I'm not so sure I want us to make that amount of money. But it's a possibility we can discuss. Okay? Materials, okay, number one is bulletin.	N/A
MARÍA EUGENIA GARCEZ	Es-, espérame un	Hold, hold on a	N/A
STEVEN DONZIGER	Oh, chuta ol-, olvide la cuestión del fiscal.	Oh, shoot! I, I forgot about the prosecutor.	N/A
MARÍA EUGENIA GARCEZ	Eso. Um hm.	That's right. Um hm.	N/A
MARÍA GUADALUPE LUISA de HEREDIA GARCÍA	El, el fiscal.	The, the prosecutor.	N/A
STEVEN DONZIGER	Okay, entonces la idea que yo creo, el fiscal puede ver también la noticia de ahora, ¿okay? Entonces yo creo que la cuestión es si hay dos cuestiones: Si hagamos los dos temas o un tema. Número dos, si hagamos los dos temas, ¿en qué orden?	Okay then, so what I think is that the prosecutor can see today's news too, okay? So I think the question is if there are two questions. Whether we do both subjects or one subject. Number two, if we do both subjects, in what order?	
MARÍA EUGENIA GARCEZ	A ver, yo creo que la noticia realmente la, la más atractiva va a ser la del físcal. Porque eso le abre otro frente a Texaco y además, es pedir una demanda penal.	opens up another front for	N/A
STEVEN DONZIGER	Okay, pero Luís, ¿qué tenemos en eso, exactamente? En la carta de, ¿firmado por quién¿	Okay, but Luis, what have we got on that, exactly? In the letter, signed by whom?	N/A
LUIS YANZA	Eh, lo mismo que estaba con unos cambios que se hizo Pablo y enfocado para que firmen organizaciones.	Uh, it's the same but with a few changes that Pablo made, focused on getting organizations to sign it.	N/A
STEVEN DONZIGER	¿Pero cuántos van a firmar, y quién?	But how many people are going to sign and who?	N/A
LUIS YANZA	Están firmadas ya, los dirigentes de las nacionalidades.	They're already signed by the leaders of the different peoples.	N/A
STEVEN DONZIGER	Okay, ¿y quién más?	Okay, and who else?	N/A
LUIS YANZA	Eh, y del Frente, [UI]. Está firmado por Eduardo, María Gabriela y mañana fírma Esperanza, y espero hacer firmar a Luís Marcas. Hasta ahí	Uh, and from the Front, [UI].It's signed by Eduardo, Maria Gabriela, and Esperanza is going to sign tomorrow and I hope to get Luis Marcas to sign it. That's as far	N/A
MARÍA EUGENIA YÉPEZ REGALADO	¿Pero eso tenemos para el martes?	But can we have that by Tuesday?	N/A
LUIS YANZA	Sí.	Yes.	N/A
MARÍA EUGENIA YÉPEZ REGALADO	¿Sí?	Yes?	N/A

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TITLE OF CLIP: CRS-198-00-CLIP-04

UI = Unintelligible

MARÍA GUADALUPE LUISA	Sí.	Yes.	N/A
de HEREDIA GARCÍA			
STEVEN DONZIGER	Okay, primero, ¿piensan ustedes que debe firmar alguien más que es factible para mañana? No sé, para, para hacerlo más fuerte. Eso es fuerte, para hacerlo más fuerte.	know, to, to make it stronger. That's strong, to make it	N/A
MARÍA EUGENIA YÉPEZ REGALADO	Tal vez firmará Eduardo Delgado.	Maybe Eduardo Delgado will sign.	N/A
LUIS YANZA	Está firmado ya.	It's already signed.	N/A
MARÍA EUGENIA YÉPEZ REGALADO	¿Está firmado? Perfecto	It's already signed? Perfect.	N/A
LUIS YANZA	Ya está firmado.	It's already signed.	N/A
MARÍA EUGENIA YÉPEZ REGALADO	Eso es fuerte.	That is strong.	N/A
MARÍA GUADALUPE LUISA de HEREDIA GARCÍA	¿Va estar Eduardo Delgado en la rueda de prensa?	Is Eduardo Delgado going to be at the press conference?	N/A
LUIS YANZA	Sí, tengo que decirle.	Yes, I have to tell him.	N/A
STEVEN DONZIGER	¿Y Alexis, no quiere que firme?	And Alexis, do you want him to sign?	N/A
LUIS YANZA	No me ha contestado, hasta ahora. No sé qué pasó.	I haven't heard back yet. I don't know what happened.	N/A
STEVEN DONZIGER	¿Pero idealmente quiere que firmara o no?	But ideally, do you want him to sign or not?	N/A
LUIS YANZA	Si puede firmar, bien, si no, tampoco, no	If he can sign, good, if not, that's all right too.	N/A
STEVEN DONZIGER	Ya, no es	He's not	N/A
LUIS YANZA	no me, no me	he hasn't, he hasn't	N/A
STEVEN DONZIGER	Él es un poquito desprestigiado.	He's been discredited a little	N/A
LUIS YANZA	Ahorita no está muy	Right now it's not very	N/A
STEVEN DONZIGER	¿Hay alguien más?	Is there anyone else?	N/A
MARÍA EUGENIA YÉPEZ REGALADO	A mí me parece que es un tema súper importante el de los noventa días de reemplazo, porque la cantidad de plata como	I think a very important subject is the ninety-day replacement thing because the amount of money like	N/A
	[end of recording]	[end of recording]	N/A



STATE OF CALIFORNIA		
	)	
	)	
	)	
COUNTY OF SAN FRANCISCO	)	SS

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Spanish into English of the attached transcription excerpt CRS210-02-CLIP 01.

Brandon Carney, West Coast Regional Manager Geotext Translations, Inc.

State of California, County of San Francisco Subscribed and sworn to (or affirmed) before me

on this 11th day of Avens

,20 (0,

proved to me on the basis of satisfactory evidence

to be the person(s) who appeared before me.

Signature:

MELISSA PIERONI
COMIM. # 1755133
NOTARY PUBLIC - CALIFORNIAM
My Comm. Expires July 3, 2011

TITLE OF CLIP: CRS210-02-CLIP 01

UV = Unidentified Voice (Voz No Identificada)

SPEAKER	ORIGINAL	TRANSLATION (English)
LUIS MACAS	Nosotros, desde las	We, from the indigenous
	nacionalidades indígenas,	nationalities, from our
	desde nuestras organizaciones,	organizations, we want, uh, to
	queremos, eh, decir al país y al	tell the country and the world,
	mundo, eh, finalmente son	uh, finally it has been thirteen
	trece años de esperas, o más	years of delays, or over thirteen
	de trece años, que este caso,	years, that this case, uh, has
	eh, se viene arrastrando, y por	been dragging, and why. The
	qué. La compañía Texaco ha	Texaco company has put all of
	puesto todos los los, uh,	the the, uh, obstacles, as it has
	obstáculos, como se ha dicho	been said here, it has wanted to
	aquí, ha querido recubrir,	cover, precisely, any mechanism
	precisamente, a cualquiera de	in order to prolong time. As we
	los mecanismos a fin de poder	commonly say, trying to burn
	prolongar el tiempo. Como	time. Practically the entire trial.
	decimos nosotros,	Therefore, we, from the
	comúnmente, tratando de	indigenous nationalities that are
	quemar el tiempo. Todo,	truly affected, our Siona,
	prácticamente, el proceso. De	Secoya, Cofan, Huaorani,
	tal modo de que, nosotros, desde las nacionalidades	Quichuan brothers, and the non-indigenous farming
	indígenas donde realmente	community, are friends who
	están afectados, los hermanos	have withstood this fight, and
	siona, secoya, los cofanes,	are friends who have been,
	huaoranis, quichuan, y la	obviously, working throughout
	comunidad campesina no-	these thirteen years. Not,
	indígena, son compañeros que	perhaps, only because, uh, you
	han resistido en esta lucha, y	can perceive the violation of
	son compañeros que han	people's fundamental rights,
	venido, obviamente,	the collective rights under the
	trabajando durante todos los	Political Constitution of the
	trece años. No, quizás,	State, these rights of indigenous
	solamente porque, eh, se	peoples also being protected by
	siente ahí la violación a los	covenant one hundred sixty-
	derechos fundamentales de las	nine, but because the
	personas, los derechos	aggressive manner in which the
	colectivos que están	Texaco company has acted goes
	contemplado [sic] en la	against the sovereignty of the
	Constitución Política del	State. Against the rights of all
	Estado, y que también	Ecuadorians. That is why we
	garantiza estos mismos	believe that this time,
	derechos de los pueblos	decisively, with this last
	indígenas el convenio ciento	recourse that remains, which is
	sesenta y nueve, sino porque la	the global expert assessment,
	agresión con que ha actuado la	that the attorneys are filing, and
	compañía Texaco va en contra	which they will obviously
	de la soberanía del Estado. En	explain, will mark the end of
	contra de todos los derechos	this case. In no way would we
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	de los ecuatorianos y ecuatorianas. Y, por eso, creemos de que esta vez, definitivamente, con este último recurso que queda, que es el peritaje global, que están presentando los abogados, y obviamente que lo explicarán ellos, sea ya el punto final de este caso. No quisiéramos, de ninguna manera, aunque el día de ayer estuvimos en el en el juzgado, hablando con el Presidente de la Corte Superior de	want, although yesterday we were in the in the court, speaking with the President of the Superior Court of
UV	Nueva Loja.	Nueva Loja.
	Nucva Eoja.	ivacva Loja.
MACAS	Sucumbíos, de Nueva Loja, él nos decía, mostrándonos cinco tomos de presentación como argumento para que no se realice este peritaje global, presentado por la Texaco, esas cosas son los [sic] que van prolongando en el tiempo este este caso tan importante. Como, vuelvo y repito, no solamente para las nacionalidades indígenas, para los campesinos afectados, sino para todos los ecuatorianos.	Sucumbíos, in Nueva Loja, he told us, showing us five volumes of filings in arguments against this global expert assessment being conducted, filed by Texaco, these things are those that prolong time in this this case which is so important. As I have said, not only for the indigenous nationalities, for the affected farmers, but for all Ecuadorians.
	[susurros ininteligibles]	[unintelligible whispering]
	[fin de grabación]	[end of recording]